

1
2
3
4
5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 GEORGE WINTERS, an individual,
9 PEGGY WINTERS, an individual,

10 Plaintiff(s),

11 vs.
12 THOR MOTOR COACH, a Delaware
13 corporation; DEMARTINI RV SALES, an
14 unknown California entity; DOES 1 - 10 and
15 ROES 1-10, inclusive,

16 Defendant(s).
17 _____

Case #3:20-cv-00332-MMD-WG

18
19
20
21
22
23
24
25
26
27
28
**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

John D. Sear, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Bowman and Brooke LLP

(firm name)

with offices at 150 South Fifth Street, Suite 3000
(street address)

Minneapolis

Minnesota

55402

(city)

(state)

(zip code)

612-339-8682, john.sear@bowmanandbrooke.com.
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

Thor Motor Coach and DeMartini RV Sales to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

3. That since October 25, 1991 (date), Petitioner has been and presently is a member in good standing of the bar of the highest Court of the State of Minnesota (state) where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or from the clerk of the supreme court or highest admitting court of each state, territory, or insular possession of the United States in which the applicant has been admitted to practice law certifying the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Court	Date Admitted	Bar Number
North Dakota	4/22/99	05679
South Dakota	7/18/16	4743
USDC Arkansas (Eastern District)	6/6/00	
USDC Colorado	8/19/11	
USDC Indiana (Northern District)	1/28/15	
USDC Michigan (Western District)	2/25/10	
USDC Wisconsin (Eastern District)	5/5/95	
USDC Wisconsin (Western District)	10/10/05	
7th Circuit Court of Appeals	7/27/07	
8th Circuit Court of Appeals	10/21/08	
10th Circuit Court of Appeals	4/26/11	

5. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

(State "none" if Petitioner has no disciplinary proceedings, etc.)

None

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 (State "none" if Petitioner has never been denied admission.)

4 None

5 6. That Petitioner is a member of good standing in the following Bar Associations.

6 7. (State "none" if Petitioner is not a member of other Bar Associations.)

7 None

8 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2

9 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

12 Date of Application	13 Cause	14 Title of Court Administrative Body or Arbitrator	15 Was Application Granted or Denied
16 02/04/19	17 2:18-cv-01628	18 USDC Nevada	19 Granted
20	21	22	23
24	25	26	27
28	29	30	31

20 (If necessary, please attach a statement of additional applications)

21 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
22 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
23 extent as a member of the State Bar of Nevada.

24 10. Petitioner agrees to comply with the standards of professional conduct required of
25 the members of the bar of this court.

26 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
27 practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY

STATE OF Minnesota)
COUNTY OF Hennepin)

Petitioner's signature

John D. Sear, Petitioner, being first duly sworn, deposes and says:

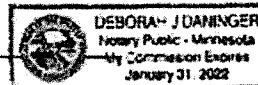
That the foregoing statements are true.

Subscribed and sworn to before me this

10th day of September, 2020

Deborah J. Dawson

Notary Public or Clerk of Court



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Janice Jensen,
(name of local counsel) Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

9790 Gateway Drive, Suite 200
(street address)

Reno, Nevada, 89521,

775-322-1170 house@lawalt-nomura.com

(area code + telephone number) (Email address)

(Area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6

7 The undersigned party(ies) appoint(s) Janice Jensen as
8 (name of local counsel)
his/her/their Designated Resident Nevada Counsel in this case.

9

10 Michael Pangburn
(party's signature)

11

12 T. Michael Pangburn, General Counsel
(type or print party name, title)

13 Janice Jensen
(party's signature)

14

15 OWNER DEMARTINI & V SALES
(type or print party name, title)

16

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19

20 Janice Jensen
Designated Resident Nevada Counsel's signature

21 563
Bar number

22 jjensen@laxalt-nomura.com
Email address

23

24 **APPROVED:**

25 Dated: this 17th day of September, 2020.

26 John A. Jensen
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b) and Section IV of the District of Nevada Electronic Filing Procedures, I hereby certify that I am an employee of LAXALT & NOMURA, LTD., and that I caused to be served a true and correct copy of the foregoing document by E-Service by filing the foregoing with the Clerk of Court using the CM/ECF system, which will electronically mail the filing to the following email addresses:

Mark Forsberg, Esq., NSB 4265
Rick Oshinski, Esq., NSB 4127
OSHINSKI & FORSBERG, LTD.
504 E. Musser Street, Suite 202
Carson City, NV 89701
T 775-301-4250
F 775-301-4251
Mark@oshinskiforsberg.com
Rick@oshinskiforsberg.com

Attorneys for Plaintiffs

DATED this 16th day of September, 2020.

/s/ Laurie Pieratt
LAURIE PIERATT

STATE OF MINNESOTA
IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

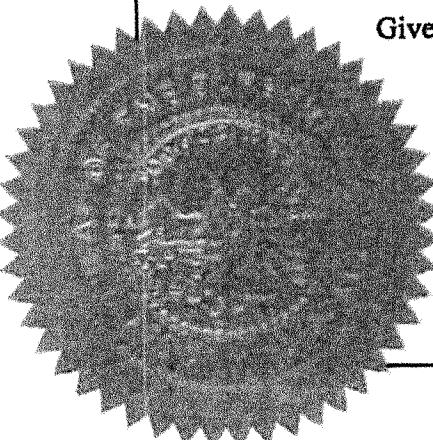
JOHN DAVID SEAR

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 25, 1991

Given under my hand and seal of this court on

June 30, 2020



Emily J. Eschweiler

Emily J. Eschweiler, Director
Office of Lawyer Registration